

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

VS

RICHARD GARZA

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DOCKET NO.: 4:19-CR-00232-1

AGREED MOTION TO CONTINUE SENTENCING

TO THE HONORABLE EWING WERLEIN, JR., UNITED STATES DISTRICT JUDGE FOR
THE SOUTHERN DISTRICT OF TEXAS, HOUSTON, DIVISION:

NOW COMES, RICHARD GARZA, by and through counsel, and moves this Honorable
Court to continue sentencing for a period of at least three weeks and in support would show the
following:

I.

Sentencing in this cause is currently set for Friday, February 26, 2021.

Undersigned has been in conversation with AUSA Ollison regarding the audit that was Ordered
by this Honorable Court shortly after the status conference that was held on November 18, 2020.
Although the audit is progressing, it is not yet complete and all sides believe it is imperative to
have it concluded, disseminated, and reviewed prior to sentencing.

Undersign and AUSA have also been in discussion about resolving other issues related to
this cases.

II.

Defendant, Richard Garza, has been on pretrial release since April 15, 2019 and has been
fully compliant with all conditions.

III.

The purpose of this Motion is not for delay but in order for justice to be served.

IV.

Defendant, by and through his attorney, E. Matthew Leeper, Jr., respectfully request that this Court issue an order in accordance with this Agreed Motion to Continue Sentencing for a period of at least three weeks so that all parties involved can finalize the audit.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that this Honorable Court grant this motion.

Respectfully submitted,
/s/ E. Matthew Leeper, Jr.
E. Matthew Leeper, Jr.
Attorney for Defendant
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CERTIFICATE OF CONFERENCE

On February 19, 2021, Defendant's Motion for a Continuance was discussed with the Assistant United States Attorney. The Assistant United States Attorney advised he is in agreement with Defendant's Motion for a Continuance.

/s/ E. Matthew Leeper, Jr.
E. Matthew Leeper, Jr.

CERTIFICATE OF SERVICE

I, E. Matthew Leeper, Jr. certified that on this 19th day of February, 2021, a true and correct copy of Defendant's Motion for a Continuance was served on the Assistant United States Attorney, via electronic filing.

Respectfully submitted,
/s/ E. Matthew Leeper, Jr.
E. Matthew Leeper, Jr.